

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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NOVARTIS PHARMACEUTICALS  
CORPORATION,

Plaintiff,

v.

ACTAVIS LLC; APOTEX, INC.;  
APOTEX, CORP.; GLAND PHARMA  
LTD.; DR. REDDY'S LABORATORIES,  
INC.; DR. REDDY'S LABORATORIES  
LTD.; EMCURE PHARMACEUTICALS  
USA, INC.; EMCURE  
PHARMACEUTICALS, LTD; HOSPIRA,  
INC.; PHARMACEUTICS  
INTERNATIONAL INC.; SAGENT  
PHARMACEUTICALS, INC.; ACS  
DOBFAR INFO S.A.; STRIDES, INC.;  
AGILA SPECIALTIES PRIVATE LTD.;  
SUN PHARMA GLOBAL FZE;  
CARACO PHARMACEUTICAL  
LABORATORIES, LTD; SUN  
PHARMACEUTICAL INDUSTRIES  
LTD.; WOCKHARDT USA LLC; and  
WOCKHARDT LTD.

Defendants.

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Civil Action No. 13-1028 (SDW) (MCA)

**DECLARATION OF RACHEL L. WEINER  
IN SUPPORT OF NOVARTIS'S MOTION TO SEAL**

I, Rachel L. Weiner, declare as follows:

1. I am a Senior Associate at Wilmer, Cutler, Pickering, Hale and Dorr, 1875 Pennsylvania Avenue NW, Washington, DC 20006, and counsel for Plaintiff Novartis Pharmaceuticals Corporation ("Novartis") in the above-captioned matter. I submit this certification in support of Novartis's Motion to Seal.

2. Novartis is requesting entry of an Order, pursuant to Local Civil Rule 5.3(c), to seal the following documents [D.I. 232]:

- 1) Portions of Novartis's Opposition to Wockhardt's Motion to Dismiss Count II of the Corrected Amended Complaint; and
- 2) Exhibits 1 and 2 to the Declaration of Robert W. Trenchard in Support of Novartis's Opposition to Wockhardt's Motion to Dismiss Count II of the Corrected Amended Complaint.

(collectively, the "Subject Material").

3. The aforementioned documents include information relating to Defendants Wockhardt USA LLC and Wockhardt Ltd. ("Defendants") ANDA product and/or proprietary business information that Defendants have designated as confidential and/or nonpublic. By making such a designation, Defendants have manifested their belief that the public disclosure of this information could adversely affect their legitimate business interests. Without conceding that the information found in the Subject Material warrants such a designation, Plaintiff attempts to honor this designation by filing the Subject Material under seal pursuant to Local Rule 5.3.

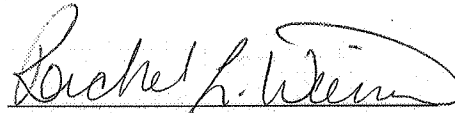
4. If this submission is not sealed, it is my understanding defendants would suffer harm.

5. There is no less restrictive alternative other than the sealing of this information.

This is the least restrictive alternative available to protect information that is confidential and/or pursuant to Fed. R. Civ. P. 26(c).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: May 14, 2013

A handwritten signature in black ink, appearing to read "Rachel L. Weiner", written over a horizontal line.

Rachel L. Weiner